

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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47 EAST 34TH STREET (NY), L.P.,

Plaintiff,

v.

BRIDGESTREET WORLDWIDE, INC.,
VERSA CAPITAL MANAGEMENT, LLC,
DOMUS BWB FUNDING, LLC, SEAN
WORKER, LEE CURTIS, WAYNE
WALKER, WALTER DEMBIEC, JOHN
DOE, JANE DOE, DOMUS BWB FUNDING,
LLC AND/OR BRIDGESTREET
WORLDWIDE, INC.,

Defendants.

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20-cv-9978-LJL

ORAL ARGUMENT REQUESTED

NOTICE OF PLAINTIFF’S MOTION TO REMAND

PLEASE TAKE NOTICE that upon the accompanying *Memorandum of Law in Support of Plaintiff’s Motion to Remand for Lack of Subject Matter Jurisdiction or, Alternatively, for Discretionary Abstention* and the *Declaration of Jay R. Indyke in Support of Plaintiff’s Motion to Remand*, and the exhibits annexed thereto, Plaintiff 47 East 34th Street (NY), L.P. (“Plaintiff”), by and through its undersigned counsel, hereby moves this Court for an order remanding this action back to the Supreme Court of the State of New York – County of New York: Commercial Division or, in the alternative, abstaining from determining this action pursuant to 28 U.S.C. § 1334 (c)(1).

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Dated: December 23, 2020
New York, New York

/s/ Jay R. Indyke

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